



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

June 29, 2023

**BY ECF AND EMAIL**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Stephen Buyer, 22 Cr. 397 (RMB)***

Dear Judge Berman:

The Government respectfully submits this letter in response to the Court's order directing it to advise the Court of its position with respect to forfeiture and restitution. (Dkt. 132).

With respect to forfeiture, the Government requests the Court order the defendant to forfeit \$349,846.61, which represents the total ill-gotten gains from the defendant's insider trading scheme. *See* PSR ¶ 39; *United States v. Contorinis*, 692 F.3d 136, 147 (2d Cir. 2012) (affirming forfeiture of crime proceeds under the defendant's control).

With respect to restitution, the Government has conferred with counsel for the two victims of the defendant's misappropriation and understands both victims intend to seek restitution in this case for costs incurred in assisting in the criminal investigation and prosecution of the defendant. While the Government is still gathering supporting materials from the victims, the Government understands Guidehouse seeks \$261,667.42 in restitution, and T-Mobile Corporation seeks approximately \$1.1 million in restitution. The Government expects to receive additional supporting materials next week and is hopeful it will be in a position to update the Court and propose a schedule for resolving restitution at the scheduled sentencing on July 11, 2023. *See* 18 U.S.C. § 3664(d)(5) (permitting the Court to resolve restitution within 90 days following sentencing); *see also Dolan v. United States*, 560 U.S. 605, 611 (2010).

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The Government remains available to address any additional questions the Court may have.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
Kiersten A. Fletcher  
Margaret Graham  
Assistant United States Attorneys  
(212) 637-2238/2923

cc: Counsel for Stephen Buyer (by ECF and email)